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Attorneys for Defendants Spencer Strong and Blake McDougal

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH**

JOHN WEBER, et al.,

Plaintiffs,

v.

COLLIERS INTERNATIONAL GROUP,
INC., et al.,

Defendant.

**DEFENDANT SPENCER STRONG'S
ANSWER AND AFFIRMATIVE
DEFENSES TO FIRST AMENDED
COMPLAINT**

Case No. 2:25-cv-00162-DBB

Judge: David Barlow

Defendant Spencer Strong (“Defendant”), by and through his undersigned counsel of record, hereby Answer to Plaintiffs’ Amended Complaint against him and provides the following answers to the allegations of the Amended Complaint. In Answering the allegations of the Amended Complaint, Defendant’s answers are limited solely to answering the allegations that have been made against him. Defendant is not purporting to answer any allegations directed to any other defendant. Defendant therefore provides the following answers to the allegations asserted against him in the Amended Complaint.

RESPONSE TO INTRODUCTION

The introduction to the Amended Complaint consists largely of arguments to which no response is required. To the extent a response is required, Defendant generally deny the allegations contained in the Introduction to the Amended Complaint, and state that it is not in conformity with the requirements of Federal Rule of Civil Procedure 8 and 10(b). Defendant specifically denies any allegations contained in the Introduction to the extent those allegations are directed specifically at Mr. Defendant.

PARTIES

1. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

2. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

3. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

4. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

5. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

6. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

7. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

8. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

9. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

10. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

11. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

12. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

13. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

14. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

15. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

16. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

17. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

18. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

19. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

20. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

21. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

22. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

23. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

24. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

25. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

26. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

27. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

28. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

29. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

30. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

31. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

32. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

33. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

34. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

35. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

36. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

37. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

38. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

39. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

40. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

41. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

42. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

43. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

44. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

45. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

46. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

47. Admitted.

48. Paragraph 48 of the Amended Complaint contains legal conclusions to which no response is required. To the extent a response is required, Defendant admits only that he provided certain services on behalf of Millcreek. Defendant otherwise denies the allegations contained in this paragraph.

49. Paragraph 48 of the Amended Complaint contains legal conclusions to which no response is required. To the extent a response is required, Defendant admits only that he provided certain services on behalf of Colliers. Defendant otherwise denies the allegations contained in this paragraph.

50. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

51. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

52. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

53. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

54. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

55. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

56. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

57. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

58. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

59. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

60. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

61. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

62. This paragraph of the Amended Complaint contains no factual allegations directed to Defendant and thus no response by Defendant is required. To the extent a response is required, Defendant admits only that the Amended Complaint purports to refer to certain defendants collectively as the “Colliers/Long Parties.” Answering further, Defendant denies that Plaintiffs’ attempt to lump the individual defendants together is proper or warranted.

63. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

64. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

65. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

66. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

67. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

68. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

69. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

70. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

71. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

72. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

73. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

74. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

75. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

76. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

77. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

78. Paragraph 78 of the Amended Complaint contains legal conclusions to which no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

79. Paragraph 79 of the Amended Complaint contains legal conclusions to which no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

80. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

81. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

82. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

83. This paragraph of the Amended Complaint contains no factual allegations directed to Defendant and thus no response by Defendant is required. To the extent a response is required, Defendant admits only that the Amended Complaint purports to refer to certain

plaintiffs collectively as the “Pine Bluff Plaintiffs.” Answering further, Defendant denies that Plaintiffs’ attempt to lump the individual plaintiffs together is proper or warranted.

84. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

85. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

86. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

87. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

88. This paragraph of the Amended Complaint contains no factual allegations directed to Defendant and thus no response by Defendant is required. To the extent a response is required, Defendant admits only that the Amended Complaint purports to refer to certain plaintiffs collectively as the “Draper Plaintiffs.” Answering further, Defendant denies that Plaintiffs’ attempt to lump the individual plaintiffs together is proper or warranted.

89. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

90. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

91. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

92. This paragraph of the Amended Complaint contains no factual allegations directed to Defendant and thus no response by Defendant is required. To the extent a response is required, Defendant admits only that the Amended Complaint purports to refer to certain plaintiffs collectively as the “Lehi Plaintiffs.” Answering further, Defendant denies that Plaintiffs’ attempt to lump the individual plaintiffs together is proper or warranted.

93. This paragraph of the Amended Complaint contains no factual allegations directed to Defendant and thus no response by Defendant is required. To the extent a response is required, Defendant admits only that the Amended Complaint purports to refer to certain plaintiffs collectively as the “Crockett Plaintiffs.” Answering further, Defendant denies that Plaintiffs’ attempt to lump the individual plaintiffs together is proper or warranted.

JURISDICTION

94. Admitted.

95. Admitted.

96. Admitted.

97. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

THE TIC PROGRAM

98. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

99. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

100. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

101. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

102. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

103. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

104. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

105. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

106. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

107. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

108. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

109. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

110. This paragraph of the Amended Complaint contains no factual allegations directed to Defendant and thus no response by Defendant is required. To the extent a response is required, Defendant admits only that the Amended Complaint purports to refer to certain individuals and entities collectively as the “HSH Parties.” Answering further, Defendant denies that Plaintiffs’ attempt to lump these individuals and entities together is proper or warranted.

111. Paragraph 111 of the Amended Complaint contains no allegations to which a response is required. To the extent a response is required, denied.

112. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

113. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

114. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

115. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

116. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

117. This paragraph of the Amended Complaint contains no factual allegations directed to Defendant and thus no response by Defendant is required. To the extent a response is required, Defendant admits only that the Amended Complaint purports to refer to certain individuals and entities collectively as “Neuragenex” or as the “Neuragenex Parties.” Answering further, Defendant denies that Plaintiffs’ attempts to lump these individuals and entities together is proper or warranted.

118. Paragraph 118 of the Amended Complaint contains no allegations to which a response is required. To the extent a response is required, denied.

119. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

120. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

121. This paragraph of the Amended Complaint contains no factual allegations directed to Defendant and thus no response by Defendant is required. To the extent a response is required, Defendant admits only that the Amended Complaint purports to refer to certain entities as “Pulse Healthcare” or the “Pulse Healthcare Parties.” Answering further, Defendant denies that Plaintiffs’ attempts to lump these entities together is proper or warranted.

122. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

123. Paragraph 123 of the Amended Complaint contains no allegations to which a response is required. To the extent a response is required, denied.

124. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

125. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

126. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

127. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

128. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

129. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

130. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

131. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

132. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

133. This paragraph of the Amended Complaint contains no factual allegations directed to Defendant and thus no response by Defendant is required. To the extent a response is

required, Defendant admits only that the Amended Complaint purports to refer to certain individuals as “Advisors.” Answering further, Defendant denies that Plaintiffs’ attempts to lump these individuals together is proper or warranted.

134. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

135. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

136. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

137. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

138. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

139. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

140. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

141. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

142. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

143. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same. Answering further, Defendant affirmatively states that the document referred to in this paragraph of the Amended Complaint speaks for itself, and must be considered in its entirety, and on said grounds Defendant denies the allegations regarding the documents.

144. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same. Answering further, Defendant affirmatively states that the document referred to in this paragraph of the Amended Complaint speaks for itself, and must be considered in its entirety, and on said grounds Defendant denies the allegations regarding the documents.

145. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

146. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

147. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same. Answering further, Defendant affirmatively states that the document referred to in this paragraph of the Amended Complaint speaks for itself, and must be considered in its entirety, and on said grounds Defendant denies the allegations regarding the documents.

148. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same. Answering further, Defendant affirmatively states that the document referred to in this paragraph of the Amended Complaint speaks for itself, and must be considered in its entirety, and on said grounds Defendant denies the allegations regarding the documents.

149. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same. Answering further, Defendant affirmatively states that the document referred to in this paragraph of the Amended Complaint speaks for itself, and must be considered in its entirety, and on said grounds Defendant denies the allegations regarding the documents.

150. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

151. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

152. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

153. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

154. Defendant admits only that he performed certain services on behalf of Millcreek Commercial Properties. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same. Except as expressly admitted, denied.

155. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

156. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

157. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

158. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same. Answering further, Defendant affirmatively states that the document referred to in this paragraph of the Amended Complaint speaks for itself, and must be considered in its entirety, and on said grounds Defendant denies the allegations regarding the documents.

159. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same. Answering further, Defendant affirmatively states that the document referred to in this paragraph of the Amended Complaint speaks for itself, and must be considered in its entirety, and on said grounds Defendant denies the allegations regarding the documents.

160. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

161. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

162. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

163. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

164. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

165. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

166. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

167. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

168. Admitted as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

169. Admitted as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

170. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

171. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

172. The allegations contained in paragraph 172 of the Amended Complaint contain only legal conclusions to which no response is required. To the extent a response is required, Defendant denies the allegations of this paragraph as being incomplete.

173. The allegations contained in paragraph 173 of the Amended Complaint contain only legal conclusions to which no response is required. To the extent a response is required, Defendant denies the allegations of this paragraph as being incomplete.

174. The allegations contained in paragraph 175 of the Amended Complaint contain only legal conclusions to which no response is required. To the extent a response is required, Defendant denies the allegations of this paragraph as being incomplete.

175. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same. Answering further, Defendant affirmatively states that the document referred to in this paragraph of the Amended Complaint speaks for itself, and must be considered in its entirety, and on said grounds Defendant denies the allegations regarding the documents.

176. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

177. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

178. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

179. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

180. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

181. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

182. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same. Answering further, Defendant affirmatively states that the document referred to in this paragraph of the Complaint speaks for itself, and must be considered in its entirety, and on said grounds Defendant denies the allegations regarding the documents.

183. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

184. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

185. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

186. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

187. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

188. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

189. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

190. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

191. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

192. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

193. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

194. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

195. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

196. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

197. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

198. Defendant admits only that he had some communications with certain Plaintiffs. Except as expressly admitted, Defendant denies the remaining allegations contained in this paragraph of the Amended Complaint. With respect to allegations against other individuals, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

199. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

200. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

201. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same. Answering further, Defendant affirmatively states that the document referred to in this paragraph of the Complaint speaks for itself, and must be considered in its entirety, and on said grounds Defendant denies the allegations regarding the documents.

202. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same. Answering further, Defendant affirmatively states that the document referred to in this paragraph of the Complaint speaks for itself, and must be considered in its entirety, and on said grounds Defendant denies the allegations regarding the documents.

203. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same. Answering further, Defendant affirmatively states that the document referred to in this paragraph of the Complaint speaks for itself, and must be considered in its entirety, and on said grounds Defendant denies the allegations regarding the documents.

204. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

205. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

206. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

207. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

208. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

209. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same. Answering further, Defendant affirmatively states that the document referred to in this paragraph of the Amended Complaint speaks for itself, and must be considered in its entirety, and on said grounds Defendant denies the allegations regarding the documents.

210. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

211. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same. Answering further, Defendant affirmatively states that the document referred to in this paragraph of the Amended Complaint speaks for itself, and must be considered in its entirety, and on said grounds Defendant denies the allegations regarding the documents.

212. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

213. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same. Answering further, Defendant affirmatively states that the document referred to in this paragraph of the Amended Complaint speaks for itself, and must be considered in its entirety, and on said grounds Defendant denies the allegations regarding the documents.

214. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

215. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

216. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended

Complaint, and therefore denies the same. Answering further, Defendant affirmatively states that the document referred to in this paragraph of the Amended Complaint speaks for itself, and must be considered in its entirety, and on said grounds Defendant denies the allegations regarding the documents.

217. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same. Answering further, Defendant affirmatively states that the document referred to in this paragraph of the Amended Complaint speaks for itself, and must be considered in its entirety, and on said grounds Defendant denies the allegations regarding the documents.

218. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same. Answering further, Defendant affirmatively states that the document referred to in this paragraph of the Amended Complaint speaks for itself, and must be considered in its entirety, and on said grounds Defendant denies the allegations regarding the documents.

219. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

220. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same. Answering further, Defendant affirmatively states that the document referred to in this paragraph of the Amended Complaint speaks for itself, and must

be considered in its entirety, and on said grounds Defendant denies the allegations regarding the documents.

221. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

222. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same. Answering further, Defendant affirmatively states that the document referred to in this paragraph of the Amended Complaint speaks for itself, and must be considered in its entirety, and on said grounds Defendant denies the allegations regarding the documents.

223. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

224. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same. Answering further, Defendant affirmatively states that the document referred to in this paragraph of the Amended Complaint speaks for itself, and must be considered in its entirety, and on said grounds Defendant denies the allegations regarding the documents.

225. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same. Answering further, Defendant affirmatively states that

the document referred to in this paragraph of the Amended Complaint speaks for itself, and must be considered in its entirety, and on said grounds Defendant denies the allegations regarding the documents.

226. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

227. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

228. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same. Answering further, Defendant affirmatively states that the document referred to in this paragraph of the Amended Complaint speaks for itself, and must be considered in its entirety, and on said grounds Defendant denies the allegations regarding the documents.

229. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same. Answering further, Defendant affirmatively states that the document referred to in this paragraph of the Amended Complaint speaks for itself, and must be considered in its entirety, and on said grounds Defendant denies the allegations regarding the documents.

230. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

231. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

232. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same. Answering further, Defendant affirmatively states that the document referred to in this paragraph of the Amended Complaint speaks for itself, and must be considered in its entirety, and on said grounds Defendant denies the allegations regarding the documents.

233. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

234. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

235. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

236. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same. Answering further, Defendant affirmatively states that the document referred to in this paragraph of the Amended Complaint speaks for itself, and must be considered in its entirety, and on said grounds Defendant denies the allegations regarding the documents.

237. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same. Answering further, Defendant affirmatively states that the document referred to in this paragraph of the Amended Complaint speaks for itself, and must be considered in its entirety, and on said grounds Defendant denies the allegations regarding the documents.

238. Paragraph 238 of the Amended Complaint contains only legal conclusions to which no response is required. To the extent a response is required, To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

239. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

240. Paragraph 240 of the Amended Complaint contains no allegations to which a response is required. To the extent a response is required, denied.

241. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

242. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

243. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

244. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

245. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same. Answering further, Defendant affirmatively states that the document referred to in this paragraph of the Amended Complaint speaks for itself, and must be considered in its entirety, and on said grounds Defendant denies the allegations regarding the documents.

246. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

247. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

248. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

249. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

250. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

251. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

252. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

253. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

254. This paragraph of the Amended Complaint contains no factual allegations directed to Defendant and thus no response by Defendant is required. To the extent a response is required, Defendant admits only that the Amended Complaint purports to refer to certain individuals and entities as “Developer Parties.” Answering further, Defendant denies that Plaintiffs’ attempts to lump these individuals and entities together is proper or warranted.

255. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

256. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

257. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

258. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

259. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

260. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

261. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

262. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

263. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

264. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

265. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

266. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

267. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

268. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

269. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

270. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

271. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

272. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

273. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

274. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

275. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

276. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

277. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

278. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

279. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

280. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

281. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

282. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

283. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

284. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

285. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

286. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

287. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

288. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

289. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

290. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

291. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

292. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

293. Defendant admits only that he forwarded certain marketing materials to certain plaintiffs. Defendant denies all remaining allegations contained in this paragraph of the

Amended Complaint as it pertains to him. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

294. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

295. This paragraph of the Amended Complaint contains no allegations to which a response is required. To the extent a response is required, denied.

296. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

297. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

298. Defendant admits only that he forwarded certain marketing materials to certain Plaintiffs and otherwise denies the allegations contained in this paragraph of the Amended Complaint, including each subparagraph thereto, as it pertains to him. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

299. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

300. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, including each subparagraph thereto, and therefore denies the same.

301. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

302. Paragraph 302 of the Amended Complaint contains only legal conclusions to which no response is required. To the extent a response is required, denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

303. Denied as to Defendant, including each subparagraph thereto. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

304. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

305. Paragraph 305 of the Amended Complaint contains only legal conclusions to which no response is required. To the extent a response is required, denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

306. Denied as to Defendant, including each subparagraph thereto. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

307. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

308. Paragraph 308 of the Amended Complaint contains only legal conclusions to which no response is required. To the extent a response is required, denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

309. Denied as to Defendant, including each subparagraph thereto. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

310. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

311. Paragraph 311 of the Amended Complaint contains only legal conclusions to which no response is required. To the extent a response is required, denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

312. Defendant denies making any misrepresentations.

313. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

314. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

315. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

316. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

317. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

318. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

319. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

320. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

321. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

322. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

323. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

324. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

325. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

326. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

327. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

328. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

329. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

330. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

331. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

332. Paragraph 332 of the Amended Complaint contains only legal conclusions to which no response is required. To the extent a response is required, denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

333. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

334. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

335. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, including each subparagraph thereto, and therefore denies the same.

336. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

337. Paragraph 337 of the Amended Complaint contains only legal conclusions to which no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

338. Defendant admits only that he had some communications with certain Plaintiffs. Except as expressly admitted, Defendant denies the remaining allegations of this paragraph of the Amended Complaint. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

339. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

340. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, including each subparagraph thereto, and therefore denies the same.

341. Defendant admits only that he had certain communications with certain Plaintiffs in early 2020, related to a potential investment. Except as expressly admitted, Defendant denies

the remaining allegations of this paragraph of the Amended Complaint, including each subparagraph thereto, and therefore denies the same.

342. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, including each subparagraph thereto, and therefore denies the same.

343. Paragraph 343 of the Amended Complaint contains only legal conclusions to which no response is required. To the extent a response is required, denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

344. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

345. Paragraph 345 of the Amended Complaint contains only legal conclusions to which no response is required. To the extent a response is required, denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

346. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

347. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

348. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

349. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

350. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

351. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

352. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

353. Paragraph 353 of the Amended Complaint contains only legal conclusions to which no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

354. Defendant admits only that he had certain communications with certain Plaintiffs in early 2020, related to a potential investment. Except as expressly admitted, Defendant denies the remaining allegations of this paragraph of the Amended Complaint, including each subparagraph thereto, and therefore denies the same.

355. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

356. Paragraph 356 of the Amended Complaint contains only legal conclusions to which no response is required. To the extent a response is required, denied.

357. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

358. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

359. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

360. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

361. Paragraph 288 of the Amended Complaint contains only legal conclusions to which no response is required. To the extent a response is required, denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

362. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

363. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, including each subparagraph thereto, and therefore denies the same.

364. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, including each subparagraph thereto, and therefore denies the same.

365. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

366. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

367. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, including each subparagraph thereto, and therefore denies the same.

368. Paragraph 295 of the Amended Complaint contains only legal conclusions to which no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

369. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

370. Paragraph 297 of the Amended Complaint contains only legal conclusions to which no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

371. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

372. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, including each subparagraph thereto, and therefore denies the same.

373. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, including each subparagraph thereto, and therefore denies the same.

374. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

375. Paragraph 302 of the Amended Complaint contains only legal conclusions to which no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

376. Defendant denies making any misrepresentations. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

377. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

378. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

379. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

380. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

381. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

382. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

383. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

384. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

385. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

386. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

387. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

388. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

389. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, including each subparagraph thereto, and therefore denies the same.

390. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, including each subparagraph thereto, and therefore denies the same.

391. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, including each subparagraph thereto, and therefore denies the same.

392. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, including each subparagraph thereto, and therefore denies the same.

393. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, including each subparagraph thereto, and therefore denies the same.

394. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, including each subparagraph thereto, and therefore denies the same.

395. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, including each subparagraph thereto, and therefore denies the same.

396. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

397. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

398. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

399. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

400. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

401. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

402. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

403. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

404. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

405. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

406. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

407. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

408. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

409. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

410. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

411. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

412. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

413. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

414. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

415. Defendant admits only to having visited certain of the locations at issue in this action with certain of the plaintiffs. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

416. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

417. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

418. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

419. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

420. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

421. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

422. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

423. Defendant denies making any misrepresentations. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

424. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

425. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

426. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

427. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

428. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

429. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

430. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

431. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

432. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

433. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

434. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

435. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

436. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

437. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

438. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

439. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

440. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

441. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

442. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

443. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

444. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

445. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

446. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

447. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

448. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

449. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

450. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

451. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

452. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

453. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

454. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

455. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

456. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

457. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

458. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

459. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

460. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

461. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

462. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

463. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

464. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

465. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

466. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

467. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

468. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

469. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

470. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

471. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

472. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

473. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

474. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

475. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

476. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

477. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

478. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

479. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

480. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

481. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

482. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

483. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

484. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

485. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

486. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

487. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

488. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

489. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

490. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

491. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

492. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

493. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

494. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

495. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

496. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

497. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

498. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

499. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

500. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

501. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

502. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

503. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

504. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

505. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

506. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

507. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

508. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

509. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

510. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

511. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

512. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

513. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

514. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

515. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

516. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

517. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

518. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

519. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

520. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

521. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

522. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

523. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

524. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

525. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

526. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

527. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

528. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

529. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

530. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

531. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

532. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

533. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

534. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

535. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

536. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

537. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

538. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

539. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

540. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

541. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, including each subparagraph thereto, and therefore denies the same.

542. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

543. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

544. Paragraph 524 of the Amended Complaint contains only legal conclusions to which no response is required. To the extent a response is required, Defendant lacks sufficient

knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

545. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

546. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

547. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

548. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

549. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

550. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

551. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

552. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

553. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

554. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

555. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, including each subparagraph thereto, and therefore denies the same.

556. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

557. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, including each subparagraph thereto, and therefore denies the same.

558. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

559. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

560. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

561. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

562. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

563. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

564. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

565. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

566. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

567. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

568. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

569. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

570. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

571. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

572. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

573. Paragraph 553 of the Amended Complaint contains only legal conclusions to which no response is required. To the extent a response is required, denied as to Defendant.

Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

574. Paragraph 554 of the Amended Complaint, including each subparagraph thereto, contains only legal conclusions to which no response is required. To the extent a response is required, denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

575. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, including each subparagraph thereto, and therefore denies the same.

576. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, including each subparagraph thereto, and therefore denies the same.

577. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

578. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

579. Paragraph 559 of the Amended Complaint contains only legal conclusions to which no response is required. To the extent a response is required, denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

580. Paragraph 560 of the Amended Complaint contains only legal conclusions to which no response is required. To the extent a response is required, denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

581. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

582. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

583. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

584. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

585. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

586. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

587. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

588. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

589. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

590. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

591. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

592. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

593. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, including each subparagraph thereto, and therefore denies the same.

594. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

595. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

596. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

597. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

598. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

599. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, including each subparagraph thereto, and therefore denies the same.

600. Paragraph 580 of the Amended Complaint contains only legal conclusions to which no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

601. Paragraph 581 of the Amended Complaint contains only legal conclusions to which no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

602. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, including each subparagraph thereto, and therefore denies the same.

603. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

604. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

FIRST CAUSE OF ACTION
(Violations of Section 10(b) of the Securities Exchange Act and Rule 10b-5 – Against All Defendants)

605. Paragraph 585 of the Amended Complaint contains only legal conclusions to which no response is required. To the extent a response is required, denied.

606. Paragraph 586 of the Amended Complaint contains only legal conclusions to which no response if required. To the extent a response is required, denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

607. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

608. Denied as to Defendant, including each subparagraph thereto. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

609. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

610. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

611. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

612. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

613. Paragraph 593 of the Amended Complaint contains only legal conclusions to which no response is required. To the extent a response is required, denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

614. Paragraph 594 of the Amended Complaint contains only legal conclusions to which no response is required. To the extent a response is required, denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

615. Paragraph 595 of the Amended Complaint contains only legal conclusions to which no response is required. To the extent a response is required, denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

616. Denied as to Defendant, including each subparagraph thereto. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

617. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

SECOND CAUSE OF ACTION
(Sale of Unregistered Securities – Against the Colliers/Long Parties)

618. Paragraph 598 of the Amended Complaint contains only legal conclusions to which no response is required. To the extent a response is required, denied.

619. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

620. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

621. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

622. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

623. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

THIRD CAUSE OF ACTION
(Control Person Liability Under the Securities Exchange Act – Against All Defendants)

624. Paragraph 604 of the Amended Complaint contains only legal conclusions to which no response is required. To the extent a response is required, denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

625. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

626. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

627. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

628. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

629. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

630. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

631. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

632. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

633. Paragraph 613 of the Amended Complaint contains only legal conclusions to which no response is required. To the extent a response is required, denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

634. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

FOURTH CAUSE OF ACTION
(State Law Securities Fraud – Against All Defendants)

635. Paragraph 615 of the Amended Complaint contains only legal conclusions to which no response is required. To the extent a response is required, denied.

636. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same. Answering further, Defendant denies the allegations of this paragraph of the Amended Complaint as incomplete.

637. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in this paragraph of the Amended Complaint, and therefore denies the same.

638. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

639. Defendant denies making any misrepresentations. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

640. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

641. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same. Answering further, Defendant denies the allegations of this paragraph of the Amended Complaint as incomplete.

642. Denied as to Defendant, including each subparagraph thereto. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

643. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same. Answering further, Defendant denies the allegations of this paragraph of the Amended Complaint as incomplete.

644. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

645. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

646. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

FIFTH CAUSE OF ACTION

(State Law Securities Violation/Sale by Unlicensed Broker or Investment Adviser – Against the Colliers/Long Parties)

647. Paragraph 627 of the Amended Complaint contains only legal conclusions to which no response is required. To the extent a response is required, denied.

648. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the

same. Answering further, Defendant denies the allegations of this paragraph of the Amended Complaint as incomplete.

649. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

650. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

651. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

652. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

653. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

SIXTH CAUSE OF ACTION
(Materially Aiding State-Law Securities Fraud – Against All Defendants)

654. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

655. Denied as to Defendant, including each subparagraph thereto. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

656. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

657. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

658. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

SEVENTH CAUSE OF ACTION
(Common Law Fraud – Against the Colliers/Long Parties)

659. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

660. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

661. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

662. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

663. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

664. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

EIGHTH CAUSE OF ACTION
(Negligent Misrepresentation Against the Colliers/Long Parties)

665. Paragraph 645 of the Amended Complaint contains only legal conclusions to which no response is required. To the extent a response is required, denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

666. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

667. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

668. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

669. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

670. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

671. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

672. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

673. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

674. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

675. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

NINTH CAUSE OF ACTION
**(Breach of Fiduciary Duty – Against the Colliers/Long Parties, Mary Street, CAMS Realty,
Mountain West Commercial Real Estate)**

676. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

677. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

678. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

679. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

680. Paragraph 660 of the Amended Complaint contains only legal conclusions to which no response is required. To the extent a response is required, denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

681. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

682. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

683. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

684. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

685. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

686. Paragraph 667 of the Amended Complaint contains only legal conclusions to which no response is required. To the extent a response is required, denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

687. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

TENTH CAUSE OF ACTION
(Concealment/Fraudulent Nondisclosure Against the Colliers/Long Parties, Mary Street, CAMS Realty, Mountain West Commercial Real Estate)

688. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

689. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

690. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

691. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

692. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

693. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

694. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

695. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

ELEVENTH CAUSE OF ACTION
**(Elder Abuse/Abuse of Vulnerable Adults by Plaintiffs John Weber and Gayle Weber –
Against the Colliers/Long Parties, Mary Street, CAMS Realty, Mountain West
Commercial Real Estate)**

696. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

697. Paragraph 678 of the Complaint contains only legal conclusions to which no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

698. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

699. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

700. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

701. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

702. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

703. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

704. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

705. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

706. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

707. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

708. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

709. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

TWELFTH CAUSE OF ACTION
(Conspiracy to Engage in Tortious Conduct – Against All Defendants)

710. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

711. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

712. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

713. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

714. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

THIRTEENTH CAUSE OF ACTION
(Aiding and Abetting Tortious Conduct Against All Defendants)

715. Paragraph 696 of the Amended Complaint contains only legal conclusions to which no response is required. To the extent a response is required, denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

716. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

717. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

718. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

719. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

FOURTEENTH CAUSE OF ACTION
(Negligence – Against Colliers Defendants)

720. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

721. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

722. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

723. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

724. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

FIFTEENTH CAUSE OF ACTION
(Violations of 18 U.S.C. § 1926(a) – Against Defendants Kevin Long, Spencer Taylor, Brent Smith, and Jerald Adam Long)

725. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

726. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

727. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

728. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

729. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

730. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

731. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

732. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

733. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

734. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

735. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

736. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

737. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

738. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

739. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

740. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

741. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

742. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

743. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

744. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

745. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

746. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, including each subparagraph thereto, and therefore denies the same.

747. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

748. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

SIXTEENTH CAUSE OF ACTION
(Violations of 18 U.S.C. § 1926(c) – Against All Defendants)

749. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

750. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

751. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

752. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

753. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

754. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

755. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, including each subparagraph thereto, and therefore denies the same.

756. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

757. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

SEVENTEENTH CAUSE OF ACTION
(Violation of 18 U.S.C. § 1926(d) – Against All Defendants)

758. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

759. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

760. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, including each subparagraph thereto, and therefore denies the same.

761. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

762. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

763. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

EIGHTEENTH CAUSE OF ACTION
(Unjust Enrichment of Defendants – Against All Defendants)

764. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

765. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

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767. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

768. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

769. Denied as to Defendant. Defendant otherwise lacks sufficient knowledge or information to form a belief as to the truth of the allegations of this paragraph of the Amended Complaint, and therefore denies the same.

RESPONSE TO DEMAND FOR RELIEF

Defendant denies that Plaintiffs are entitled to any of the relief sought in the Amended Complaint, including any relief sought in paragraphs 1 through 4 of the Demand for Relief. Defendant respectfully requests that the Court dismiss Plaintiffs' Amended Complaint and each claim and cause of action asserted therein on the merits and with prejudice, and that the Court award Defendants their costs and attorneys' fees incurred in defending this action as well as such other and further relief as may be warranted.

AFFIRMATIVE DEFENSES

Defendant asserts the following affirmative defenses without assuming the burden of proof.

FIRST DEFENSE

Plaintiffs' claims are barred, in whole or in part, because the Amended Complaint fails to state a claim against Defendant upon which relief may be granted.

SECOND DEFENSE

Plaintiffs' claims are barred, in whole or in part, because the alleged securities are not securities under federal or state law.

THIRD DEFENSE

Plaintiffs' claims are barred, in whole or in part, because the alleged securities and subject transactions, to the extent they are deemed securities, are subject to exemptions from registration, whether self-executing or otherwise.

FOURTH DEFENSE

Plaintiffs' claims are barred, in whole or in part, because the alleged wrongful conduct was the conduct of others, including the conduct or fault of Plaintiffs.

FIFTH DEFENSE

Plaintiffs' claims are barred, in whole or in part, because Defendant acted in good faith and in good-faith reliance on the information provided by others.

SIXTH DEFENSE

Plaintiffs' claims are barred, in whole or in part, because Plaintiffs failed to mitigate their damages, if any.

SEVENTH DEFENSE

Plaintiffs' claims are barred, in whole or in part, because Plaintiffs have failed to join one or more necessary and indispensable parties.

EIGHTH DEFENSE

Plaintiffs' claims are barred, in whole or in part, because of their own negligence or fault and by application of the Utah Liability Reform Act, Utah Code §§ 78B-5-817 through 823. Plaintiffs' recovery, if any, should be reduced or barred accordingly. To the extent Plaintiffs' fault was equal to, or greater than, any negligence or fault upon the part of the Defendant, then Defendant are not liable to Plaintiffs under the provisions of the Act.

NINTH DEFENSE

Plaintiffs' claims are barred, in whole or in part, because Plaintiffs have failed to satisfy the pleading and substantive requirements of the Private Securities Litigation Reform Act of 1995.

TENTH DEFENSE

Plaintiffs' claims are barred, in whole or in part, because of waiver or estoppel, whether express or implied.

ELEVENTH DEFENSE

Plaintiffs' claims are barred, in whole or in part, because of Plaintiffs unclean hands, bad faith, wrongful or inequitable conduct.

TWELFTH DEFENSE

Plaintiffs' claims are barred, in whole or in part, because Plaintiffs' damages, if any, are the result of Plaintiffs' own actions or omissions, or the acts or omissions of third parties over whom Defendant had no right of control.

THIRTEENTH DEFENSE

Plaintiffs' claims are barred, in whole or in part, because they are barred by the economic loss rule.

FOURTEENTH DEFENSE

Plaintiffs' claims are barred, in whole or in part, because Defendant lacked the necessary knowledge, intent, willfulness, or scienter required for them to be held liable.

RESERVATION

Defendant reserves the right to assert any other affirmative defenses and/or claims that may come to light during the course of discovery.

PRAYER FOR RELIEF

WHEREFORE, Defendant respectfully request that the Plaintiffs' Amended Complaint be dismissed with prejudice and upon the merits, that Defendant be awarded his costs and attorneys' fees incurred in defending this action as provided for by contract or law, and for such other and further relief as the Court may deem necessary, just, and equitable under the circumstances.

DATED this 11th day of June, 2025.

MITCHELL BARLOW & MANSFIELD, P.C.

/s/ J. Ryan Mitchell

J. Ryan Mitchell

Christopher A. Langston

Colby Tinney

Attorneys for Defendant Spencer Strong

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 11, 2025, I caused a true and correct copy of the foregoing **DEFENDANT SPENCER STRONG'S ANSWER AND AFFIRMATIVE DEFENSES TO FIRST AMENDED COMPLAINT** to be served via the Court's electronic filing system, which automatically provides notice to all counsel of record in this matter.

/s/ Colby Tinney